

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

NOTICE OF MOTION

v.

Case No.: 24-CR-00041(RJA)(JJM)

PAUL RASLAWSKY

Defendant.

S I R S :

PLEASE TAKE NOTICE, that upon the annexed affidavit of Herbert L. Greenman, Esq. the undersigned moves this Court for an Order extending the time within which the defendant must file motions for 45 days from May 20, 2024 together with such other further relief as to this Court may seem just and proper.

DATED: Buffalo, New York
May 20, 2024

Respectfully submitted,

/s/Herbert L. Greenman

HERBERT L. GREENMAN
LIPSITZ GREEN SCIME & CAMBRIA LLP
Attorneys for Defendant
PAUL RASLAWSKY
Office and Post Office Address
42 Delaware Avenue – Suite 300
Buffalo, New York 14202
(716) 849-1333
hgreenman@lglaw.com

TO: LOUIS TESTANI, ESQ.
ASSISTANT UNITED STATES ATTORNEY
138 Delaware Avenue
Buffalo, New York 14202

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,
Plaintiff,

AFFIDAVIT

v.

PAUL RASLAWSKY
Case No.: 24-CR-00041(RJA)(JJM)
Defendant.

STATE OF NEW YORK)
COUNTY OF ERIE)ss
CITY OF BUFFALO)

HERBERT L. GREENMAN, ESQ., being duly sworn, deposes and says:

- 1) I am the attorney for the defendant Paul Raslawsky.
- 2) By Order of United States Magistrate Judge Jeremiah J. McCarthy motions were scheduled to be filed by May 20, 2024.
- 3) In preparation for the filing of the motions, counsel reviewed all of the discovery which the government has provided thus far. In conversations with Assistant United States Attorney Louis Testani, however, it is my understanding that the government has not yet provided applications for numerous search warrants which were previously applied for.
- 4) The government has advised that it expects to provide that information to the defense in the near future. I am not certain whether the government will seek a protective Order.
- 5) In any event, counsel requests the 45 day extension within which to file motions. I have spoken with Assistant United States Attorney Louis Testani who has advised that he has no objection to this request.

6) The parties agree that the speedy trial time should be excluded through the new date which the Court provides for the filing of said motions.

7) The parties also agree that the interest of the defendant and the community in a speedy disposition is outweighed by this request.

WHEREFORE, your deponent prays that this Court issue an Order accordingly.

/s/Herbert L. Greenman

Herbert L. Greenman, ESQ.

Subscribed and sworn to before me this
20th day of May, 2024

/s/Elizabeth M. Daigler

Notary Public State of New York,
Qualified in Erie County
My Commission Expires October 31, 2026.